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EDWARD BENNETT WILLIAMS (1920-1988)
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May 18, 2018

VIA ECF

The Honorable Henry Pitman
United States Magistrate Judge
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

**Re: *Coventry Capital US LLC v. EEA Life Settlements, Inc., et al.*,
Civil Action No. 1:17-cv-07417-VM-HBP**

Dear Judge Pitman:

I write on behalf of Plaintiff Coventry Capital US LLC ("Coventry Capital") in response to the Court's direction at the May 11, 2018 case management conference that the parties meet and confer and submit a proposal (or competing proposals) regarding the schedule in this matter.

As discussed at the May 11 conference, Coventry Capital seeks to move this case forward as quickly as possible. However, given the need to engage in "discovery concerning discovery" and renew its motion to compel Defendants to produce documents from their employers and/or related entities (despite the Individual Defendants' admitted ability to obtain documents from those entities in the ordinary course of business), Coventry Capital has no choice but to request an extension of the current schedule. We initially propose a modest extension to avoid unnecessary delay, as set forth on the following page. We reserve the right to request further extensions, however, as needed to complete "discovery concerning discovery," renew our motion to compel, and complete merits discovery after a ruling on that motion (including any supplemental/reopened depositions after the production of additional documents).

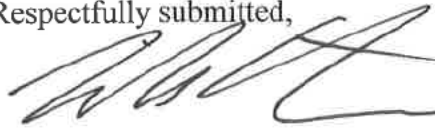
Hon. Henry Pitman
 May 8, 2018
 Page 2

Event	Current Date¹	Proposed Date
Requests for Admission to be served	May 1, 2018	August 1, 2018
Close of fact discovery	June 1, 2018	September 7, 2018
Expert reports due (for party bearing the burden of proof)	August 10, 2018	October 12, 2018
Rebuttal expert reports	September 10, 2018	November 9, 2018
Close of expert discovery	October 10, 2018	December 14, 2018
Deadline for parties to attend settlement conference	November 10, 2018	January 15, 2019

We also request that the next Case Management Conference be scheduled for the week of June 11, 2018.

With respect to the schedule proposed by defense counsel, Coventry Capital submits that the parties should aim to complete discovery within the schedule proposed above, and later assess if further extensions are necessary, rather adopting the schedule requested by defense counsel now. We would be happy to discuss this further at the Court's convenience.

Respectfully submitted,



William P. Ashworth

cc: Counsel of Record

¹ See December 7, 2017 Civil Case Management Plan and Scheduling Order (dkt. #36).